Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, DC

In the Matter of:	)	
	)	
The Notice of Proposed Rulemaking to Amend	)	
	)	
Parts 2 and 97 of the Commissions Rules to	)	ET Docket 02-98
	)	
Allocate Additional Frequencies in the LF and HF	)	
	)	
Ranges to the Amateur Radio Service	)	
	)	
	)	
_____	)	

Reply Comments to Mr. Adam M. Farson, Licensee of Amateur Radio Station AB4OJ, Ogunquit, ME.

Background and Introduction;

I, Arthur Pightling, have been a licensed radio operator in several services since 1968. I currently hold Amateur Extra license K3XF. I operate CW, phone, digital, and image modes on many amateur bands from 1.8MHz through 1.2GHz with occasional operation on 10GHz. I hold the General Radiotelephone Operator License and am employed as a principal staff engineer at Motorola, Inc.

Comment Details

In his comment Mr. Farson states:
“I strongly favor the allocation of all the new bands proposed in
This Proceeding. Each band will provide to radio operators a new
avenue for communication and experimentation.

While opposed to sub-banding by emission type in the proposed 5.25
To 5.40 MHz band, I would like to propose that the Commission

specify a maximum per-channel occupied bandwidth of 3.1 kHz at the –26 dB points (relative to maximum signal amplitude) in this band."

Response to Comment

I agree with Mr. Farsons position that the new bands should be approved to facilitate communication and experimentation.

My first point of disagreement is the implicit "channelization" in his comment. Amateur Radio Service regulations do not specify channels. Bands of frequencies are defined for Amateur Radio operation. I see no basis in Mr. Farsons comment to support this change and assume it was an error in interpretation of the regulations.

I also disagree with the premise that bandwidth restrictions are appropriate in this context. The Amateur Radio Service has been an integral part of the genesis of many advanced communications technologies. For example, single sideband in its infancy certainly would not have fit into the –26 dB at 3.1 KHz mask Mr. Farson proposes. The current state of the art in technology is digital communications. This blends very well with commercial and governmental communications requirements as I see them going forward. The state of the art also needs to be advanced in using existing modes of operation more effectively. One perspective on this topic is the inclusion of more information in the modes we currently use. This could be data and voice combined, more clearly defined audio, or automatic synchronization of parties to a communication. The carefully considered regulation confining Amateur Radio Service emissions to the amateur band in use has fostered innovation and experimentation. I see no reason to change this positive environment for growth to one that limits and constrains it.